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19 Also Present:
20
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22 Daniel Sauro - Wayland Police Department
23
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2	<u>I N D E X</u>	
3		
4		
5	<u>Direct</u>	<u>Cross</u>
6		
7	WITNESS: YVETTE LOCKHART-BEMBERY	
8	By Mr. Silverfine	4
9	By Mr. Fischer	--
10		
11		
12		
13	<u>E X H I B I T S</u>	
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STIPULATIONS

It is hereby stipulated and agreed by and between counsel for the respective parties that all objections, except as to the form of the question, and all motions to strike, are reserved until the time of trial.

It is further stipulated and agreed that the witness will read and sign the transcript, waiving notary, within 30 days.

YVETTE LOCKHART-BEMBRY, the deponent, having first been duly sworn, deposes and testifies as follows:

DIRECT EXAMINATION

Q. (By Mr. Silverfine): Good morning. My name is Jeremy Silverfine, and I represent the Town of Wayland Police Department and Daniel Sauro and Chief Robert Irving in his capacity as Chief of the Wayland Police Department in a civil action you have filed. I'll be asking you a series of questions here today, and you're obligated to answer under oath to the best that you can. Do you understand so far what I've said?

A. Yes, I do.

Q. There will be a stenographer, obviously, that

	69		70
1	Q. What time was the class?	1	get?
2	A. Nine o'clock.	2	A. You have to keep getting recertified as a
3	Q. Nine o'clock?	3	nursing assistant.
4	A. Yes.	4	Q. You were going for your recertification or this
5	Q. What time did you leave your home that day?	5	was the first time you were getting certified?
6	A. About eight.	6	A. No. I was certified many different times. But
7	Q. In relation to where you eventually stopped,	7	every time you go to a different place, they
8	how far is it from where you stopped to your	8	make you go to their certification. So this
9	home?	9	time, I wanted a certification I could travel
10	A. To my home?	10	with, that went with me.
11	Q. Yes?	11	Q. What was the address of the place in Waltham
12	A. You mean in miles?	12	that you were going to?
13	Q. Miles is fine?	13	A. I can't give you that. It's the Red Cross in
14	A. I don't know. It's like 15 to 20 minutes.	14	Waltham. There's only one place.
15	Q. The class that you were going to, had you	15	Q. Do you remember who was instructing the class?
16	signed up in advance for it?	16	A. No. I can't remember that.
17	A. Yes.	17	Q. Do you remember the weather on that particular
18	Q. Did you pay any money for it?	18	morning?
19	A. Yes, I did.	19	A. Yes. It was very -- partly sunny, partly
20	Q. How much did you pay?	20	cloudy. It depends on your outlook. No
21	A. Five hundred and something, almost \$600.	21	precipitation. The roads were dry, except in
22	Q. Five hundred dollars?	22	spots. Does that answer that?
23	A. Almost \$600.	23	Q. Was there snow on the ground, if you recall?
24	Q. What kind of certification were you going to	24	A. Not on the road.

	71		72
1	Q. Not on the road?	1	down at all --
2	A. No.	2	A. No.
3	Q. The road surface was what?	3	Q. -- prior to that date?
4	A. Dry.	4	A. No.
5	Q. Clear?	5	Q. Had you had to call AAA for the car prior to
6	A. Yes.	6	February 6, 2002?
7	Q. Did you have any problems with your vehicle up	7	A. I needed a battery once, and I got a battery.
8	until the time that it had stopped at the point	8	I got tires, brakes, things like that. Just
9	in time in which you allege your complaint?	9	general maintenance; nothing like that.
10	A. The lights went off on the dash, and I put my	10	Q. How were you dressed on the morning of
11	foot on the gas to see if it was running. It	11	February 6, 2002?
12	was not. So I looked up ahead to see where --	12	A. How was I dressed? What exactly does that
13	because I was on an incline at that point, I	13	mean?
14	looked up ahead to see where I could turn. I	14	Q. What were you wearing?
15	was very familiar with that area since I went	15	A. I had the bag at home, white jeans.
16	to Regis, which was a stone's throw from there.	16	Q. I'm sorry?
17	I pulled over to a clearing on the shoulder of	17	A. I have the bag at home because they had cut
18	the road.	18	them off of me. White jeans, we had to wear
19	Q. Had you had problems with that vehicle before	19	white pants. All I had was white jeans, which
20	February 6, 2002?	20	I have a lot of. A white top, a very -- my
21	A. No.	21	favorite silver jacket, metallic jacket, with
22	Q. Up until that time --	22	the big hood, with black faux fur around the
23	A. Nothing like that.	23	front, around the outline of the hood. I had
24	Q. Had you had any problems with the car breaking	24	my big thing that I cover my hair with.

	73		74
1	Q. You said big thing you cover your hair --	1	Q. Could you spell that for the stenographer?
2	A. I wear drapings.	2	A. Initiate?
3	Q. I'm sorry?	3	THE WITNESS: Do you know how spell
4	A. I wear head gear, head drapings.	4	"initiate"?
5	Q. Is that similar to the draping you're wearing	5	(spelling confirmed.)
6	today at the deposition?	6	Q. (By Mr. Silverfine): You consider that a
7	A. The one I had on was bigger.	7	religion?
8	Q. Bigger?	8	A. It's not really a religion. It's a way of
9	A. Yes. I don't wear them as big since 9/11.	9	life.
10	Q. Do you wear drapings everyday?	10	Q. Is there a temple that you belong to or some
11	A. Yes, I do.	11	similar church where you go?
12	Q. Why do you wear drapings everyday?	12	A. Yes, everywhere. There's one everywhere.
13	A. My religion.	13	Q. Is there one you regularly attend?
14	Q. What religion is that?	14	A. In people's homes. The one I was initiated in
15	A. Okay. That's kind of hard to answer. I was	15	Connecticut. I was going to say
16	born and raised Catholic, but I believe in all	16	Connecticut, but their home base is in Ohio.
17	religions. So I would have to say Quan Yin	17	But the closest one, it was in New York,
18	Meditation Initiate.	18	outside of New York, so Connecticut.
19	Q. I'm sorry. I'm not familiar. The reason	19	Q. Do you regularly attend some local place where
20	you're wearing --	20	you worship?
21	A. I just told you.	21	A. We're obliged to maintain whatever faith we
22	Q. You have to forgive me.	22	chose while observing their stipulations to
23	A. Quan Yin, Q-U-A-N, then a capital, Y-I-N,	23	maintain your initiation, which includes two
24	Meditation Initiate.	24	and a half hours to three hours to four hours

	75		76
1	of meditation daily, a vegan diet, which means	1	A. Yes. I believe in Jesus.
2	no meat, eggs, poultry, whatever, anything with	2	Q. I notice today in the deposition you're wearing
3	a face -- any sentient being that has feelings	3	a cross around your neck. Is that something
4	-- no alcohol, no adultery. I can't remember	4	you regularly wear?
5	what else there is. I don't do them anyway.	5	A. I wear it all the time.
6	That's about it.	6	Q. Were you wearing it on February 6, 2002?
7	Q. How long have you been participating in this?	7	A. Not this particular one. My daughter gave this
8	A. In this particular organization or how long	8	to me. It's for a nurse with the clock in the
9	have I been --	9	middle.
10	Q. Yes, in this particular organization?	10	Q. Were you wearing a cross on the outside --
11	A. -- or how long have I been dressing this way?	11	A. I had a cross, a gold cross.
12	Q. The organization first?	12	Q. -- on the outside of your clothing?
13	A. The organization was -- I was initiated in	13	A. On the day of the accident?
14	2000. I started practicing two years prior to	14	Q. Yes?
15	that, so that would be 1998. I became aware of	15	A. No. You couldn't have seen it anyway. I had a
16	the organization because I'm a Reiki master,	16	big coat on. It was winter.
17	R-E-I-K-I.	17	Q. I'm just asking what you were wearing, and
18	Q. What does that mean; what is a Reiki master?	18	today you have a --
19	A. It's a hands-on healing technique that a lot of	19	A. I had a cross on, a gold cross with a gold
20	therapists use.	20	chain, but it was underneath my clothing.
21	Q. How long have you been dressing in this	21	Q. Do you consider yourself Muslim?
22	particular fashion as you've described?	22	A. No, I don't. But, I do believe in and respect
23	A. I would say 15 to 20 years.	23	their beliefs.
24	Q. Do you consider yourself Christian, as well?	24	Q. On February 6, 2002, you said you were heading

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 1 to the Red Cross in Waltham. Did something
 2 happen along the way that caused you to stop?
 3 A. My car stopped moving.
 4 Q. Where, if you recall, did your car stop moving?
 5 A. I had just passed a Natick sign, "Entering
 6 Natick."
 7 Q. What did you do when your car stopped?
 8 A. It didn't stop. I said that I noticed that
 9 there were no lights on the dash. I put my
 10 foot on the gas. I realized it was moving
 11 because I was going downhill. But, there was
 12 no gas going to the engine. It wasn't running,
 13 basically.
 14 Q. So you say you noticed there were no lights on
 15 the dash and you were going downhill. How long
 16 did you travel in this fashion for?
 17 A. Two minutes.
 18 Q. Then what happened?
 19 A. I pulled over as far as I could, which was out
 20 of traffic completely. I tried it again to see
 21 if it would start because I thought it was a
 22 fluke or something. It would not start. I
 23 started searching for my cell phone, which I
 24 couldn't find.

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 1 Q. Were you able to restart the car?
 2 A. No, I wasn't.
 3 Q. The car, you say, was on the side of the road
 4 facing which direction?
 5 A. I was going on the proper side of the road, the
 6 right side of the road, off of the road. There
 7 was like a cemented little path there where
 8 people pull off. I have not been able to find
 9 it since then, but I know that it's there
 10 because I used to see it when I was going to
 11 Regis. I got there. I looked for my cell
 12 phone. Unable to locate it, I made the
 13 assumption that I left it at home on the table.
 14 So I decided to get out of the car and stand on
 15 the side, on the passenger side. Several
 16 people stopped and offered use of their cell
 17 phone to call AAA. Everyone was very nice.
 18 Q. In fact, did you have AAA service, the card, a
 19 member --
 20 A. Yes, of course I do.
 21 Q. Did you call AAA?
 22 A. Yes, I did.
 23 Q. Do you remember what time you called?
 24 A. No, I don't. But, I'm sure they have a record

79
 1 of it.
 2 Q. After you used the phone, did you stay outside
 3 or did you get back inside the car?
 4 A. No. I stayed outside.
 5 Q. Do you remember what direction -- you said you
 6 pulled on the side of the road. Do you
 7 remember what direction you were heading in?
 8 A. Towards Waltham.
 9 Q. You were on Route 30 at this point?
 10 A. Yes.
 11 Q. Heading towards Waltham away from Framingham?
 12 A. Yes.
 13 Q. What happened next?
 14 A. I was peacefully waiting for the arrival of
 15 AAA. They said they would put a priority on it
 16 since I was on Route 30. A woman drove up,
 17 driving in the opposite direction, and asked if
 18 I was okay. I told her, yes, I was fine, that
 19 AAA was on the way. She informed me that she
 20 had telephoned the police because she noticed I
 21 was slumped -- she thought I was slumped in the
 22 car and may have been hurt.
 23 Q. Let's stop you right there. When you say
 24 "slumped," you said you were outside the car,

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 1 though?
 2 A. I know, I wasn't. I don't know when she saw
 3 me.
 4 Q. Were you, at any point in time --
 5 A. I was looking for my cell phone.
 6 Q. The question is, at any point in time, were you
 7 slumped over the wheel of the car?
 8 A. No.
 9 Q. So this woman said to you --
 10 A. Made the assumption.
 11 Q. -- she thought you were slumped over the car?
 12 A. She said it appeared that I looked like I was
 13 hurt, and she telephoned the police to tell
 14 them.
 15 Q. What did you say, if you recall, at that point?
 16 A. I said, "No. I'm perfectly fine. I was
 17 looking for my cell phone." She said that she
 18 would notify the police that I was fine.
 19 Q. What happened next?
 20 A. The next thing I know, the police showed up.
 21 Q. The police showed up. Cruiser, marked cruiser,
 22 unmarked cruiser?
 23 A. No. It was a marked cruiser.
 24 Q. Marked cruiser. Do you remember what

<p>1 department it was?</p> <p>2 A. It was Wayland Police. She told me that she</p> <p>3 called Wayland Police.</p> <p>4 Q. Who arrived from the Wayland Police?</p> <p>5 A. I didn't know his name at the time, but it was</p> <p>6 Sergeant Sauro.</p> <p>7 Q. What did Sergeant Sauro do when he arrived?</p> <p>8 A. He proceeded to look every place, but at me.</p> <p>9 Q. Tell us exactly what he did?</p> <p>10 A. He got out of his car, walked around my car.</p> <p>11 Q. Are you on the inside of the car or the</p> <p>12 outside?</p> <p>13 A. I already told you that I was standing outside.</p> <p>14 Q. I'm just trying to get your testimony as to</p> <p>15 what happened --</p> <p>16 A. I have not moved. I am standing outside.</p> <p>17 Q. So you're outside. Where in relation to your</p> <p>18 car are you standing?</p> <p>19 A. I'm on the ground, dirt, not snow, not</p> <p>20 anything. I'm on grassy dirt.</p> <p>21 Q. You're standing on the passenger side of your</p> <p>22 car?</p> <p>23 A. Passenger side of my car.</p> <p>24 Q. You say Officer --</p>	<p>81</p> <p>1 A. Not exactly next to it.</p> <p>2 Q. What does Officer Sauro do; describe for us --</p> <p>3 A. While I was talking to him, explaining that I</p> <p>4 had been looking for my phone, he immediately</p> <p>5 just went over and ripped open my door.</p> <p>6 Q. Which door?</p> <p>7 A. Passenger side door.</p> <p>8 Q. What did he do?</p> <p>9 A. Proceeded to reach into the crevice and said,</p> <p>10 "Here's your phone."</p> <p>11 Q. What happened next?</p> <p>12 A. He said, "Move the car. It's going to be</p> <p>13 towed."</p> <p>14 Q. What did you say?</p> <p>15 A. I said, "How am I supposed to move the car if</p> <p>16 it doesn't start?"</p> <p>17 Q. What happened next?</p> <p>18 A. He said, "You just won't have power steering.</p> <p>19 The car can be moved."</p> <p>20 Q. What did you say?</p> <p>21 A. I didn't say anything because he immediately</p> <p>22 went to his radio and started calling to have</p> <p>23 it towed.</p> <p>24 Q. Did you say anything else at that particular</p> <p>82</p>

<p>1 point to the officer?</p> <p>2 A. I don't recall saying anything else because he</p> <p>3 had walked away from me and wasn't listening to</p> <p>4 me anyway. That was my perception.</p> <p>5 Q. I'm asking you, though, your best memory as to</p> <p>6 what you said and what he said at that point?</p> <p>7 A. I basically told you, to my recollection, what</p> <p>8 he said.</p> <p>9 Q. Anything else that you remember the</p> <p>10 conversation between you and Officer Sauro at</p> <p>11 that point?</p> <p>12 A. I don't recall. There probably was more.</p> <p>13 Q. I'm asking what your memory of the other</p> <p>14 conversation was?</p> <p>15 A. At this point, it's a little blurry as to what</p> <p>16 he said because traumatic events occurred</p> <p>17 during that point.</p> <p>18 Q. I'm just asking your best memory as to what</p> <p>19 else was said between you and Officer Sauro?</p> <p>20 A. I told you what I can recall.</p> <p>21 Q. At this point --</p> <p>22 A. At this point, I can't recall more than that,</p> <p>23 but I'm sure there was more.</p> <p>24 Q. I'm asking you, and I think we're entitled to</p>	<p>83</p> <p>1 know, if there is anything else you can recall</p> <p>2 as to the conversation as you sit here today</p> <p>3 between you and Officer Sauro?</p> <p>4 A. Did I just answer that?</p> <p>5 MR. FISCHER: I think she just</p> <p>6 answered that.</p> <p>7 Q. (By Mr. Silverfine): Is there anything</p> <p>8 impeding your memory today as you sit here?</p> <p>9 A. Like what?</p> <p>10 Q. That's what I'm asking you. Is there anything</p> <p>11 interfering with your memory today? Are you on</p> <p>12 medication?</p> <p>13 A. No, I'm not.</p> <p>14 Q. Did you take any alcohol or drugs in the last</p> <p>15 24 hours?</p> <p>16 A. No. I just told you I don't drink.</p> <p>17 Q. I am asking you, is there anything that would</p> <p>18 interfere with your ability to remember any</p> <p>19 further conversation between you and</p> <p>20 Officer Sauro on February 6, 2002?</p> <p>21 A. No chemically, medically anything. Maybe</p> <p>22 traumatically, I am blanking on a lot of</p> <p>23 things. But, no chemicals, medicine, anything</p> <p>24 like that is preventing me from remembering</p> <p>84</p>

	109		110
1	A. No, not to my knowledge anyway.	1	example.
2	Q. I'm going to ask you to draw a diagram of the	2	MR. SILVERFINE: I think it would be
3	roadway where your vehicle stopped and which	3	duly unsuggestive --
4	you described for us earlier where you had the	4	MR. FISCHER: That's why I'm not
5	interaction with Daniel Sauro, if you could	5	doing it.
6	just draw the road.	6	THE WITNESS: There was a street
7	MR. FISCHER: We'll stipulate that	7	there.
8	this is not to scale, and we're not	8	(off the record.)
9	grading you on your art skills.	9	Q. (By Mr. Silverfine): Are you drawing Route 30;
10	THE WITNESS: They also changed the	10	is that accurate?
11	whole road.	11	A. Yes.
12	Q. (By Mr. Silverfine): We're just asking you to	12	Q. If you could just put east and westbound?
13	draw, as best you can, your memory of the road	13	A. I don't know which is east.
14	and where your car was in relation to the road	14	Q. Is it fair to say that if I suggested that east
15	when it came to a stop. If you could draw	15	was heading towards Boston --
16	Route 30 and if you could draw the road as best	16	A. That's east?
17	you can, almost as if you were drawing a map.	17	Q. Would that be helpful?
18	A. It's only that little bit. This is the	18	A. Yes. That would be helpful. I'm terrible with
19	shoulder, which I was not on.	19	that.
20	Q. If you could draw like as if you were drawing a	20	Q. If you could draw Route 30 where your car was,
21	diagram looking down at a map, that would be	21	put a little box, maybe a rectangle, where your
22	terrific.	22	car came to a stop?
23	MR. FISCHER: Would it be helpful if	23	A. I'm coming this way.
24	I showed her a defendant's drawing as an	24	Q. You're indicating on this piece of paper you're

	111		112
1	heading eastbound, correct?	1	of the road.
2	A. I'm heading eastbound when the lights go out in	2	Q. (By Mr. Silverfine): Or the end of the road so
3	the car, and it's on downhill. It's headed --	3	that I know a second line, a straight line, is
4	not really a hill, but it was moving without	4	where the end of the road is.
5	any gas or acceleration when I realized that	5	A. That's why I drew the shoulder; I'm using this
6	there was no electricity, no power, whatever.	6	red line.
7	There was no traffic coming, no traffic in my	7	Q. You're using the red line on the piece of paper
8	rear or forward. I proceeded to just go over	8	as the end line for Route 30?
9	here.	9	A. Yes.
10	Q. You're drawing a dotted line. You put a	10	Q. Could you put a little rectangle where your car
11	triangle --	11	came to a stop?
12	A. This is like shoulder, so I'm letting you know	12	A. This is where I am. I put "shoulder" there. I
13	it was not the shoulder. The road came in --	13	don't know if that spells shoulder. This is my
14	Q. Why don't you draw what you're describing so we	14	auto. I went into here and not panicking or
15	have a little bit of an idea.	15	anything, just wondering what, if anything,
16	A. The road came in just a little bit for a car	16	happened, pulled over out of the way of
17	space. It came in, and I knew it was there.	17	traffic. This is my car stopped here.
18	There used to be some kind of stand there.	18	Q. Can we put, how about for your last name "LB,"
19	Q. Could you draw, it's not clear on this piece of	19	for "Lockhart-Bemberry." Could you put that
20	paper, where the boundary or if there is a curb	20	inside that little triangle as well as where
21	in the eastbound so it would be on the	21	you first began at the top of the page. Right
22	right-hand side --	22	off the shoulder was where you came to a stop?
23	A. A curb?	23	A. Stop.
24	MR. FISCHER: A curb, like the edge	24	Q. What is beyond where your vehicle stopped?

	113		114
1	A. Just more road.	1	Q. (By Mr. Silverfine): Did you see
2	Q. What is off to the right as you're heading	2	Officer Sauro's car pull up, the police
3	eastbound?	3	officer?
4	A. On this side?	4	A. Not until I stopped.
5	Q. As you're facing eastbound, what is facing off	5	Q. That's what I asked you. Did you understand --
6	to your right where your vehicle stopped?	6	there's no tricks here.
7	A. Nothing.	7	A. No.
8	Q. You say "nothing" --	8	MR. FISCHER: If I could be helpful,
9	A. If I went further --	9	it wasn't clear whether you meant where
10	Q. I understand. What I'm asking you is where you	10	she was when she saw the vehicle or where
11	indicated, what is off to your right?	11	the vehicle was.
12	A. Grass and snow.	12	Q. (By Mr. Silverfine): You've indicated on this
13	Q. Is it sloped, it is straight; what is there?	13	diagram that you came to a stop where you've
14	A. No. It's straight.	14	marked, correct?
15	Q. Did your car remain there?	15	A. Yes.
16	A. Yes.	16	Q. I'm asking you, can you indicate on that when
17	Q. That's where you left the car when you called	17	it is that you first saw Officer's Sauro car,
18	AAA?	18	his cruiser?
19	A. I got of the car, yes.	19	MR. FISCHER: Objection. You don't
20	MR. FISCHER: Listen to the question	20	mean when, you mean where.
21	and answer the question.	21	Q. (By Mr. Silverfine): Where did you first see
22	Q. (By Mr. Silverfine): Where is it that you	22	Officer Sauro's car?
23	first saw Officer Sauro's vehicle pull over?	23	MR. FISCHER: Objection.
24	MR. FISCHER: Objection.	24	THE WITNESS: I still can't answer

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1	that.	1	car?
2	Q. (By Mr. Silverfine): Let me ask you this.	2	A. Where did it end up?
3	Eventually, you saw Officer Sauro's car, is	3	Q. Where did it end up?
4	that fair to say or not?	4	A. I should have drawn it the other way because
5	A. Not until he was on the radio. I didn't really	5	it's way down here.
6	pay any attention.	6	Q. How far down off the piece of paper --
7	Q. When did you see him in his cruiser on the	7	A. Really far down here in trees.
8	radio? Where in relation to where you stopped	8	Q. Are you having any problem with my questions
9	did you see his cruiser?	9	because I'll be happy --
10	A. There is a little street right here. He was	10	A. But, I didn't know you were going to ask me
11	like right about here.	11	that or I would have started the other way.
12	Q. Why don't you draw another rectangle and write	12	Q. If it helps you, we'll give you another piece
13	"Sauro." When you saw that cruiser you've now	13	of paper. That's fine. I don't want to put
14	indicated by putting Sergeant Sauro in that	14	any words in your mouth. Why don't we mark
15	box, how far back was he?	15	this one as Exhibit 2 --
16	A. He was pretty far back.	16	A. No, no.
17	Q. Approximately how far back?	17	Q. Excuse me. It's my deposition.
18	A. I don't know.	18	(Whereupon a Diagram was marked as
19	Q. Give us your best estimate?	19	Exhibit No. 2.)
20	A. I can't.	20	Q. This is now Exhibit 2. For the purpose so
21	Q. You could hear him on the radio from there?	21	we're clear on the record, we've been referring
22	A. Yes. I couldn't hear what he was saying.	22	to Exhibit 2, the first diagram. I would like
23	Q. In terms of where you are, where did your car	23	you to sign and date it so it's clear you're
24	end up in relation to where you stopped the	24	the one that authored it. Just for purposes

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1 A. No.
 2 Q. How about prior to February 6, 2002?
 3 A. We did it on a monthly basis.
 4 Q. When you say "colleagues," where were these
 5 colleagues?
 6 A. What?
 7 Q. Where?
 8 A. Throughout Framingham, Cambridge, we got
 9 together and treated one another.
 10 Q. Did you see somebody in particular?
 11 A. No. We all knew one another.
 12 Q. Besides what you've told us today, what other
 13 economic damage are you claiming as a result of
 14 the injuries you suffered on February 6, 2002?
 15 A. I have no idea how to answer that question.
 16 Q. You've told us the extent of your economic
 17 damage after February 6, 2002?
 18 A. No. I haven't told you.
 19 Q. What other economic damages have you
 20 suffered --
 21 A. I said I don't have any idea of how to
 22 enumerate my financial losses.
 23 Q. Do you have any notes or diaries of the events
 24 as you wrote them down, or did you write them

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1 down, as of February 6, 2002?
 2 A. No. I don't need them.
 3 Q. Officer Sauro, was he dressed in uniform that
 4 day?
 5 A. Yes.
 6 Q. Do you recall the color of the uniform?
 7 A. No.
 8 Q. Do you recall if he was wearing a hat or not?
 9 A. No.
 10 Q. Have you filed any medical insurance claims
 11 relative to this case with anyone?
 12 A. No.
 13 MR. SILVERFINE: I think I'm
 14 finished.
 15 MR. FISCHER: In response to your
 16 question about the medical claims, there
 17 was a PIP claim filed, and there is, I
 18 believe, a lien from Mass. Medical for
 19 that.
 20 MR. SILVERFINE: Do you know when the
 21 PIP claim was filed on your behalf?
 22 THE WITNESS: No, I don't. The
 23 hospital did all that.
 24 (Deposition concluded at 4 p.m.)

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1 ERRATA SHEET

2 In accordance with the rules of procedure governing
 3 deposition, you are entitled to read and correct
 4 your deposition. Please carefully read your testimony
 5 and on this Errata Sheet, make any necessary changes
 6 or corrections to your deposition in the form or
 7 substance. You are to identify those changes/
 8 corrections by page and line number, give the
 9 correction/change desired and state the reason.
 10 Please do not mark the actual transcript. After
 11 completing this procedure, date and sign the bottom
 12 of this page where indicated as well as the witness
 13 signature page at the end of the transcript and
 14 return in accordance with your instructions.

15 Page: _____ Line Number: _____
 16 Change/Correction: _____
 17 Reason: _____

18 Page: _____ Line Number: _____
 19 Change/Correction: _____
 20 Reason: _____

21 Page: _____ Line Number: _____
 22 Change/Correction: _____
 23 Reason: _____

24 Page: _____ Line Number: _____
 25 Change/Correction: _____
 26 Reason: _____

27 Date: _____

28 Deponent's Signature: _____

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1 C E R T I F I C A T E

2 I, YVETTE LOCKHART-BEMBERY, do hereby certify
 3 under the pains and penalties of perjury that the
 4 foregoing testimony is true and accurate to the
 5 best of my knowledge and belief as amended by
 6 any errata sheet attached hereto.

7 WITNESS MY HAND, this _____ day of _____,
 8 2005.

9 _____ YVETTE LOCKHART-BEMBERY

10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____

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1	C E R T I F I C A T E
2	
3	COMMONWEALTH OF MASSACHUSETTS
4	BRISTOL, SS.
5	
6	I, THERESA M. EDWARDS, a Notary Public in and for
7	the Commonwealth of Massachusetts, duly commissioned,
8	qualified and authorized to administer oaths and to
9	take and certify depositions, do hereby certify that
10	hereinafter, on the date named above, the witness
11	personally appeared before me at the above location and
12	testified in the above-captioned case; that the said
13	witness was by me duly sworn to testify to the truth,
14	the whole truth and nothing but the truth; that
15	thereupon and while said witness was under oath, the
16	deposition was taken down by me in machine shorthand at
17	the time and place therein named and was reduced to
18	typewriting thereafter.
19	I further certify that the said deposition
20	constitutes a true record of the testimony given by the
21	said witness.
22	I further certify that I am not interested in the
23	event of this action.
24	

IN WITNESS WHEREOF, I have hereunto subscribed my
hand this 7th day of March, 2005.

Theresa M. Edwards
Notary Public

My Commission Expires:
August 16, 2007

